



Ronald J. Levine

Phone: 973-274-2001

Fax: 973-274-6404

rlvine@herrick.com

March 22, 2019

VIA ECF

Hon. Madeline Cox Arleo
United States District Court
Martin Luther King Building & U.S. Courthouse
50 Walnut Street Room 4015
Newark, NJ 07101

Re: Googlebyte v. New York Jets, LLC; Civ. Action No. 2:18-cv-11920 (MCA)(MAH)

Your Honor:

We represent Defendant New York Jets, LLC in this action which was brought by Plaintiff Googlebyte.

By Letter Order entered on February 5, 2019, Your Honor granted Defendant's Motion to Dismiss. (Dkt. #15.) This case was terminated on that date.

On March 20, 2019, we received an electronic notice from the Court that an "Application/Petition for Motion to Stay Proceedings" had been filed by Googlebyte. (Dkt. #16.) We were unable to access a copy via Pacer since it was filed under seal.

We promptly asked Googlebyte to provide us with a copy of the Application/Petition. (See attached text of email to Googlebyte.) The attached request to Googlebyte was sent by email and Federal Express on March 20, 2019.

We have thus far not received a copy of the Application/Petition from Googlebyte.

If the Court is going to consider Googlebyte's sealed "Application/Petition" notwithstanding Googlebyte's failure to serve a copy on Defendant, we respectfully request that the Court authorize the Clerk to provide us with a copy of the Application/Petition so that we can respond, if necessary.

Thank you in advance for your consideration of this request.

Respectfully submitted,

s/ Ronald J. Levine

Ronald J. Levine

cc: Hon. Michael A. Hammer

Googlebyte, 719 Irving Avenue, Bridgeton, NJ 08302 (via First Class Mail)

HERRICK, FEINSTEIN LLP • One Gateway Center • Newark, NJ 07102 • Phone: 973.274.2000 • Fax: 973.274.2500



Hon. Madeline Cox Arleo
-Page 2-

EMAIL (ALSO SENT VIA FEDERAL EXPRESS)

From: Levine, Ronald

Sent: Wednesday, March 20, 2019 3:11 PM

To: andrewbonnjr@gmail.com

Cc: King, David <dking@herrick.com>

Subject: FW: Activity in Case 2:18-cv-11920-MCA-MAH GOOGLEBYTE v. NEW YORK JETS, LLC Application/Petition

Mr. Bonner:

We received the below electronic notice from the Court that Googlebyte filed an "APPLICATION/PETITION for Motion to Stay Proceedings" in the below CLOSED action, which was previously dismissed by the Court.

Googlebyte's papers were apparently filed under seal. We cannot obtain a copy of the papers from the Court system.

We have also not received a copy of the papers from you in the mail or via email.

We are therefore not able to respond to Googlebyte's filing, assuming a response is required.

We ask that you promptly provide us with a copy of all of the documents Googlebyte filed with the Court. If we do not receive a copy of the papers from you in the next two days, we will so advise the Court, and we will request a copy from the Court. We reserve our client's right to seek any other appropriate relief.

Ronald J. Levine, Esq.

Herrick, Feinstein LLP

One Gateway Center

Newark, New Jersey 07102

973.274.2001

rlevine@herrick.com

From: njdefiling@njd.uscourts.gov <njdefiling@njd.uscourts.gov>

Sent: Wednesday, March 20, 2019 12:54 PM

To: njdefiling@njd.uscourts.gov

Subject: Activity in Case 2:18-cv-11920-MCA-MAH GOOGLEBYTE v. NEW YORK JETS, LLC Application/Petition



Hon. Madeline Cox Arleo

-Page 3-

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

NOTE TO PUBLIC ACCESS USERS Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

District of New Jersey [LIVE]

Notice of Electronic Filing

The following transaction was entered on 3/20/2019 at 12:54 PM EDT and filed on 3/20/2019

Case Name: GOOGLEBYTE v. NEW YORK JETS, LLC

Case Number: 2:18-cv-11920-MCA-MAH

Filer: GOOGLEBYTE

WARNING: CASE CLOSED on 02/05/2019

Document Number: 16

Docket Text:

APPLICATION/PETITION for Motion to Stay Proceedings; filed by GOOGLEBYTE. (sms)

NOTICE TO COUNSEL: Counsel is advised that pursuant to Local Civil Rule 5.3(c)(2), a single, consolidated motion to seal shall be filed within 14 days following the completed briefing of the materials sought to be sealed, or within 14 days following the date on which the last of such materials was filed under temporary seal if the motion is resolved, unless otherwise directed by the Court.

2:18-cv-11920-MCA-MAH Notice has been electronically mailed to:

DAVID R. KING dking@herrick.com, courtnotices@herrick.com

RONALD J. LEVINE rlevine@herrick.com, courtnotices@herrick.com

2:18-cv-11920-MCA-MAH Notice has been sent by regular U.S. Mail:

GOOGLEBYTE

719 IRVING AVENUE

BRIDGETON, NJ 08302

The following document(s) are associated with this transaction:

Document description: Main Document

Original filename: n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1046708974 [Date=3/20/2019] [FileNumber=12359635-

0] [b232f24be5e066d3c57814b54e83385dc02c9fbeddf0d6c7633bdf2614c60a2b8

32bc2476283a758340a14aa31a4cafc911c47988b523f0e8fd4d7f07102cfc]]